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December 5, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Roanne L. Mann, U.S.M.J.
225 Cadman Plaza East
Courtroom 13C South
Brooklyn, NY 11201-1804

Re: Stidham v. 161-10 Hillside Auto Ave, LLC, et al.
Case No.: 1:21-cv-7163 (HG) (RLM)
MLLG File No.: 94-2019

Dear Judge Mann:

This firm represents the Defendants, 161-10 Hillside Auto Ave., LLC d/b/a Hillside Auto Outlet (hereinafter “Hillside Auto Outlet”), Hillside Automall Inc d/b/a Hillside Auto Mall (hereinafter “Hillside Auto Mall”) (Hillside Auto Outlet and Hillside Automall collectively hereinafter the “Corporate Defendants”), Ishaque Thanwalla (hereinafter “Thanwalla”), Jory Baron (hereinafter “Jory”), Ronald M. Baron (hereinafter “Baron”), and Andris Guzman (hereinafter “Guzman”) (Thanwalla, Jory, Baron, and Guzman hereinafter “Individual Defendants”) (the Corporate Defendants and Individual Defendants collectively hereinafter the “Defendants”) in the above-referenced case.

Defendants write to respectfully request an extension of time until Friday, December 9, 2022 to submit their letter response in opposition to Plaintiff’s letter motion to compel discovery.

Pursuant to ¶ 1(E) of this Court’s Individual Rules, Defendants submit that: (i) the original date a response is due is today, December 5, 2022; (ii) the reason for the request is your undersigned has to appear for an in-person settlement conference before the Hon. Gabriel W. Gorenstein, U.S.M.J. at 2:30 PM today in another matter and is uncertain as to when that conference will be over, has an in-person court appearance tomorrow in another matter, and a deposition scheduled for Thursday, December 8, 2022 which will take the entire day and require the day prior to sufficiently prepare for; (iii-iv) there have been no prior requests to extend this deadline; (v) it is futile to ask for Plaintiff’s consent, as they have previously declined to consent to extensions of time, including while your undersigned was on trial and, further, have displayed their apparent animus towards your undersigned in their papers on the underlying motion; and (vi) Defendants do not believe that the requested extension of time affects any other scheduled dates.

Accordingly, Defendants respectfully submit that good cause exists to grant the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this Court for its time and attention to this matter.

Dated: Lake Success, New York
December 5, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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